

In the United States District Court for the District of Oregon

:

Kursten Owen (individually and :
d/b/a Elegance & Geekery LLC),
Plaintiff,

v. :

Breana Askew (individually and :
d/b/a Breromi), Kiandria Demone
Boyce,

and Does 1-100, :
Defendants. :

**Supplement to Plaintiff's Emergency
Motion for Order to Show Cause**

Case No.: 6:25-cv-01272-AA

Supplement to Plaintiff's Emergency Motion for Order to Show Cause

I, Kursten Owen, am the plaintiff in this matter. I note my prior supplements and apologize for this additional filing; however, I believe in good faith that each new filing apprises the Court of important new information that could not have been known when filing the prior supplements and that the continuous need to re-file reflects that Defendant Boyce is engaged in nearly daily violations of the Court's Preliminary Injunction that are leading to escalating threats and harm to Plaintiff. I therefore respectfully submit this filing. I attest to the following:

1. Since Plaintiff's last filing, an additional third party has made more content related to this dispute, content that essentially re-states @thecomplexrebel's content that Plaintiff discussed in a prior supplement.
2. In this video, the third party, Isaac Hayes III, states: "Breromi, entrepreneur, created a hair clip that has unique styles and shapes: stars, bows, really, really nice.

And it connects with two magnets and then it has teeth that can go through braids or locks and hold it together. She does this, she's starting to sell her product. And then there's another woman, **Kursten Owen**, that is selling the same product. She's white and **she's selling, I guess, a knockoff version of what Bre's hair clip is.** Give them the kicker. So Bre recognizes the fact that her shop is copying her style and she makes a comment in a conversation to, I guess, **Kursten Owen** about using her product. And then another influencer, Kiandra, publicly came out and defended her as well. So what happened was this girl, she filed a lawsuit against Bre, the innovator, and the activist, Kiandra, that defended her. And a judge actually sided with her. Sided with the copier. And then she did a gag order and it said within six days, a federal judge issued a gag order preventing Bre and Kiandra from publicly discussing the case. **And a UCLA law professor flagged it as constitutionally shaky. So imagine somebody steals your product, you question them about it, and then they sue you and a judge sides with you and says they can't talk about it.** This fits into the historical pattern described as **weaponizing victimhood and the legal system against black women who speak up.** And this is my problem with black media. **This is a huge story. There's a young black woman that has innovated and built something and I do not see it on The Breakfast Club. I do not see it on The Shade Room. I do not see it on The Root and The Griot.** And I understand that there's a lot going on, but we have to have our ears to the ground and to our community that when these things happen, we come to the defense of our own. Because right now, really TikTok is really the community that's standing up for her and her product. I know that she filed a patent on the product itself, but again, **we have to amplify these stories** because this is just a systematic pattern of things that black people create. **Our ideas get stolen.**

Somebody else takes it and makes a bunch of money off of it and we don't really have a chance to do anything about it.” (Exhibit A).

3. This new content is particularly concerning given it calls on media groups to re-publish this material.
4. Defendant Boyce reposted this video twice to her Instagram stories (therefore repeating and spreading its statements) and commented under the video, stating both “Since that story came out on TikTok, she has tried to hold me in contempt of court for things completely outside of my control...like my followers speaking up once they learned someone is suing me. She’s even sent emails threatening me with fines or jail time. On top of that, she took screenshots of unrelated posts where I was calling out racism, and twisted them to make it look like I was threatening her. I have never reached out to her directly, yet she continues to falsely accuse me, weapon her victimhood and trying to have me ARRESTED. But let’s be real...who tries to lock up a civil rights activist for speaking out against racism? It’s usually not the good guys.” and **“Thank you for sharing this story! It is definitely a perfect example of someone using the legal system to try and silence criticism of their unethical behavior. I want to be clear: I cannot be silenced.** I will continue to speak up, I will continue to stand firm, and I will continue to protect Black women. We’re not backing down...we’ll see this through.” (Exhibit B).
5. The narrative that Plaintiff is trying to have Defendant Boyce arrested or has been threatening her with fines or jail time via email is unfounded. The sole meet and confer email Plaintiff sent is on the record, and it even offered the option of not filing a motion for contempt if Defendant Boyce was willing to remove her reposts. Defendant Boyce chose not to do so, and she theoretically did not open the email per

her filings and therefore would not know if there are threats within them. The only threat, again, is legitimate legal process, which Defendant Boyce has a record of responding to by making posts online that incite harassment against Plaintiff.

6. Defendant Boyce similarly reposted @thecomplexrebel's first video regarding the "White Woman tears playbook" to her own Instagram page. (Exhibit C).
7. Defendant Boyce has also seemingly collaborated with "news" outlets like @atlblackstar who recently posted: "Breana Askew, (@breromi official), a young Black entrepreneur, designed a magnetic hair clip built to hold braids and locs. But a white seller, Kursten Owen, launched a near-identical product, and when Askew filed a copyright claim, Owen struck back with a defamation lawsuit. A federal judge not only sided with Owen, but also silenced Askew and activist Kiandria Demone (@kiandria) with a 14-day gag order. Askew and Demone filed a motion to challenge the order, arguing that it infringed on their First Amendment and due process rights. The gag order has since expired and the language narrowed by the judge, allowing them to speak about the case. "But the fact that the first one was granted at all is definitely alarming," says Demone. Askew has launched a GoFundMe to cover her legal expenses." Despite the clear inaccuracies in this post (no motion challenging the TRO or the injunction on First Amendment grounds has ever been before this court other than objections to their issuance generally, nor have any copyright claims been filed, and Plaintiff's product is nowhere "near-identical," to Askew's) this outlet refuses to update their language and is seemingly communicating with Defendant Boyce. Although this post does not clearly violate the injunction, Plaintiff is concerned Defendant Boyce will continue to use third parties to speak around the bounds of the injunction. (Exhibit D)

8. Defendant Boyce, nearly every other day, publicly reposts and endorses third-party content that repeats defamatory statements and incites harassment against Plaintiff. These posts explicitly encourage and amplify false narratives, directly violating the Court's preliminary injunction. This clearly shows Defendant Boyce's active participation and encouragement of enjoined conduct, not mere passive viewing or accidental sharing. Defendant Boyce even admits that these videos are her own expression, expression she will not desist from, because they show that she "cannot be silenced."
9. Defendant Boyce states in another Threads post "And anyway, I'm a radical. I do radical shit. Do you know how many times somebody has threatened to or tried to fucking arrest me? This hopefully will be the last fucking mugshot but god damn it it might not be. I don't give a fuck. I'm a radical. I don't been to the fucking system." (Exhibit G)
10. Harm to Plaintiff has escalated immensely in the last week based on these violations by Defendant. New content produced since August 24, 2025 regarding Plaintiff and naming her directly has received over 3 million views collectively. Tens of thousands of new, harassing, and disparaging comments have circulated online, new videos are created and posted daily by third parties (though Plaintiff only apprises the Court of the largest posts that are directly encouraged or reposted by Defendant Boyce), and Plaintiff is receiving escalating threats of harm daily. (Exhibit E)
11. As a result, Plaintiff has had to disable all of her business social media platforms to be solely private (including Tiktok, Threads, X, Facebook, and Instagram), limiting business exposure. As of September 6, 2025, Plaintiff lost a business collaboration (Exhibit F) and her Shopify storefront is shut down and no longer accepting new

sales (Exhibit H). These issues are the direct result of the violation of the injunction and not the underlying dispute.

12. Given the escalating threats, increased public dissemination of defamatory content, and Defendant's direct facilitation and endorsement of such content, Plaintiff respectfully urges the Court to issue prompt and severe remedial relief, including but not limited to:

1. Immediate enforcement of the Preliminary Injunction against Defendant's posting, reposting, or endorsement of harassing content, including third-party videos;
2. Expanded injunctive relief broadly prohibiting facilitation or encouragement of harassment through third parties on social media or other public platforms;
3. Consideration of appropriate sanctions for ongoing contempt of court;
4. Any other relief the Court deems necessary to protect Plaintiff's safety and the integrity of these proceedings.

Plaintiff remains mindful of the Court's docket and respectful of its time but emphasizes the acute need for immediate judicial intervention to prevent further harm.

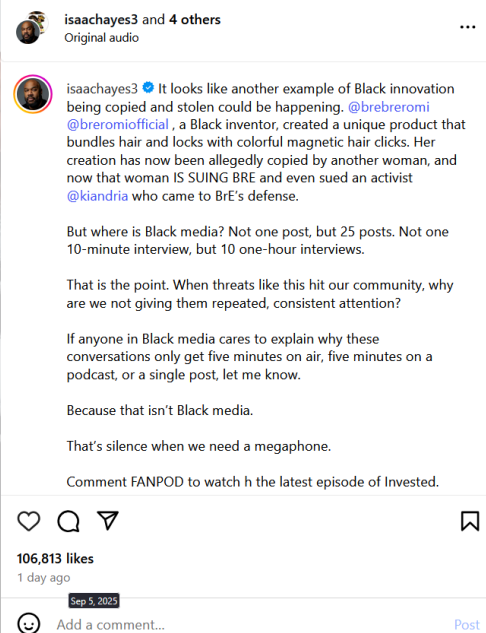
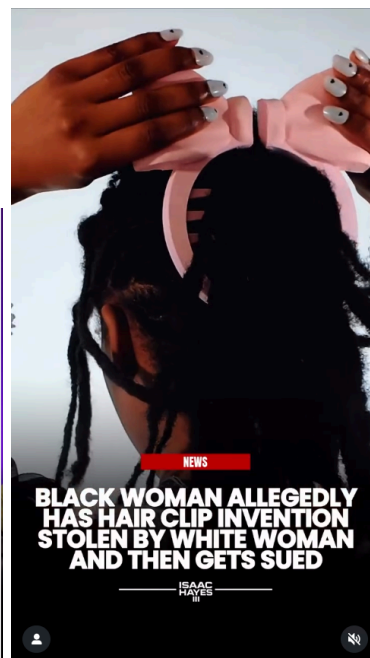
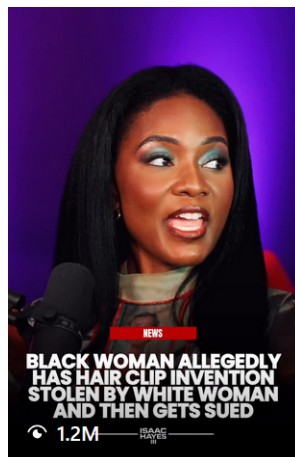
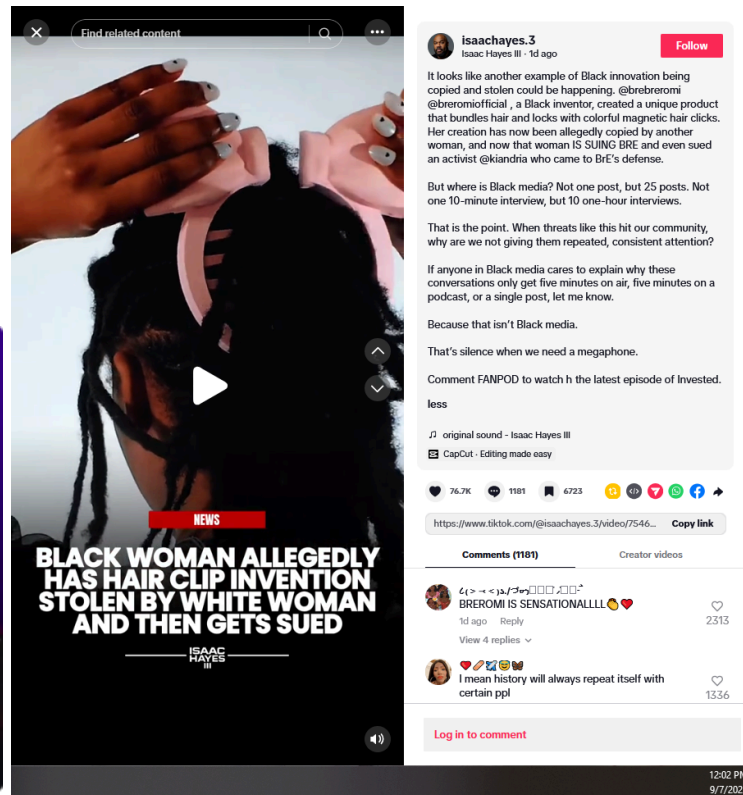
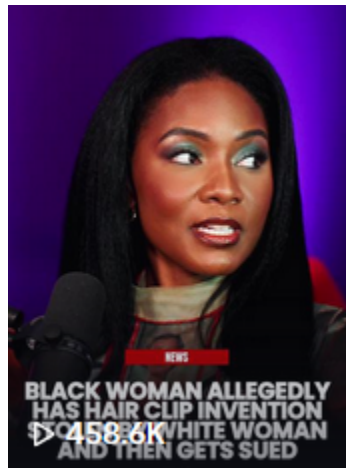
I, Kursten Owen, declare under penalty of perjury pursuant to the laws of the United States and Oregon that the above is true and correct to the best of my knowledge and belief and that all attached exhibits are true and authentic copies.

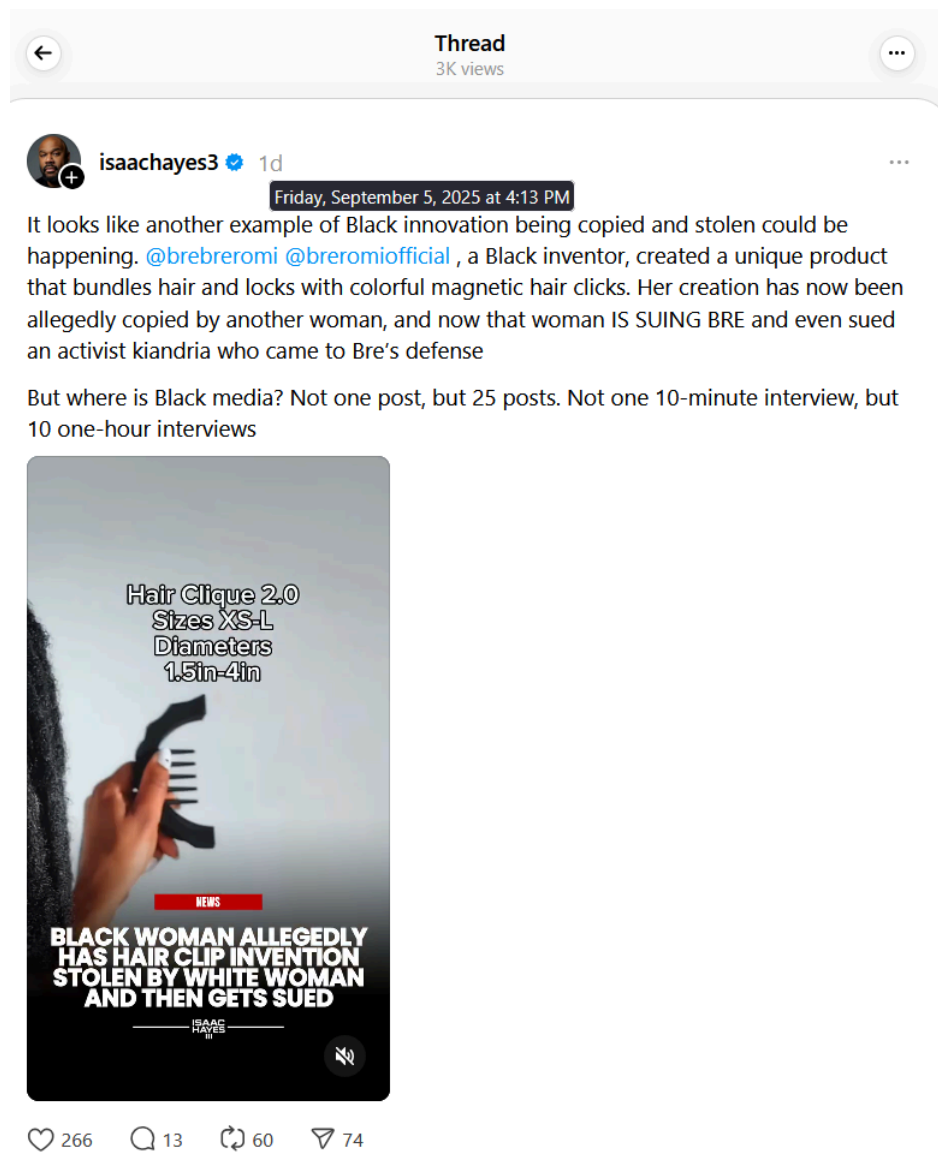
Dated: 9/7/2025

/s/ Kursten Owen - Kursten Owen

Exhibits

Exhibit A





Transcript of video posted by Isaac Hayes III

Isaac Hayes III

Breromi, entrepreneur, created a hair clip that has unique styles and shapes: stars, bows, really, really nice. And it connects with two magnets and then it has teeth that can go through braids or locks and hold it together.

She does this, she's starting to sell her product. And then there's another woman, **Kursten Owen**, that is selling the same product. She's white and **she's selling, I guess, a knockoff version of what Bre's hair clip is.**

3rd Party Commentator

Give them the kicker.

Isaac Hayes III

So Bre recognizes the fact that her shop is copying her style and she makes a comment in a conversation to, I guess, **Kursten Owen** about using her product. And then another influencer, Kiandra, publicly came out and defended her as well. So what happened was this girl, she filed a lawsuit against Bre-

3rd Party Commentator

the innovator

Isaac Hayes III

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3rd Party Commentator

Sided with the copier.

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And then she did a gag order

Isaac Hayes III

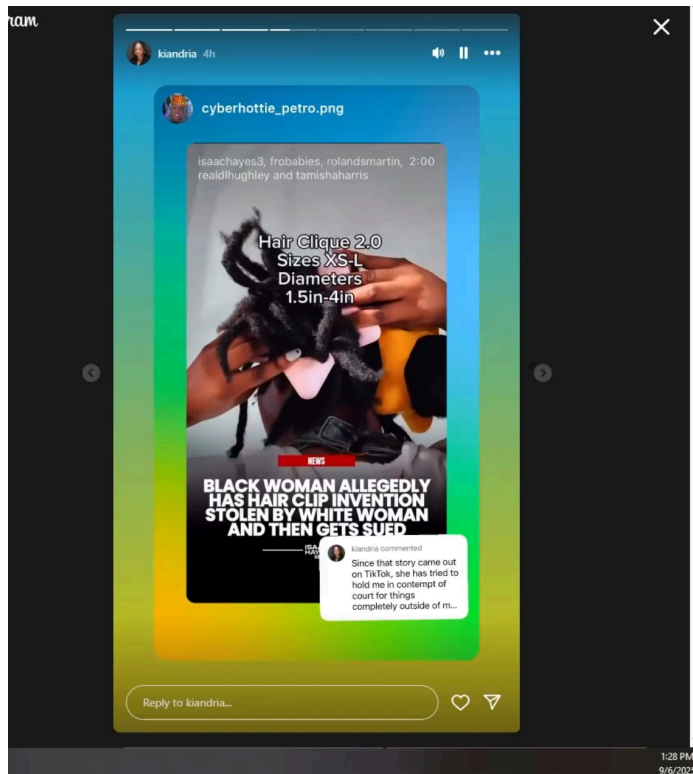
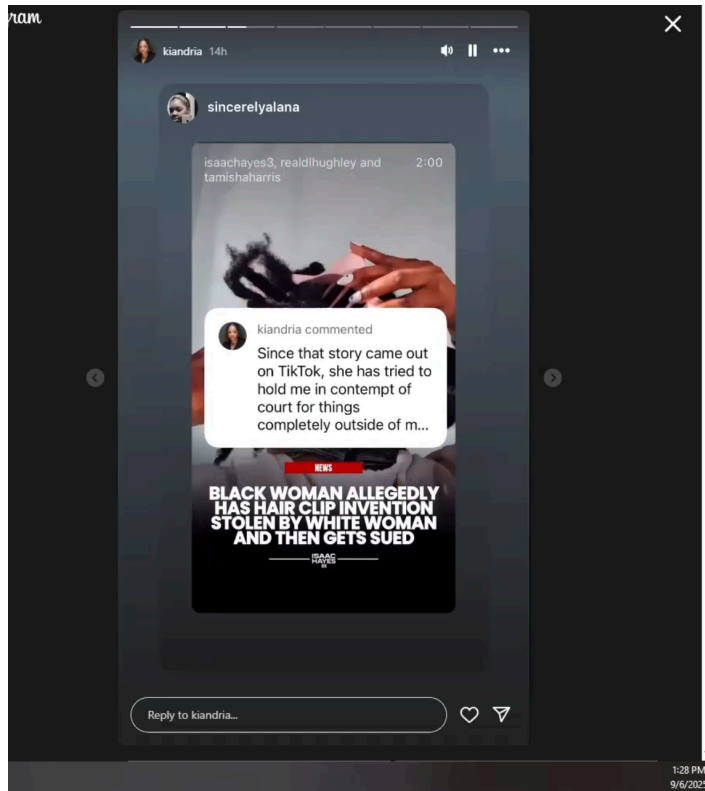
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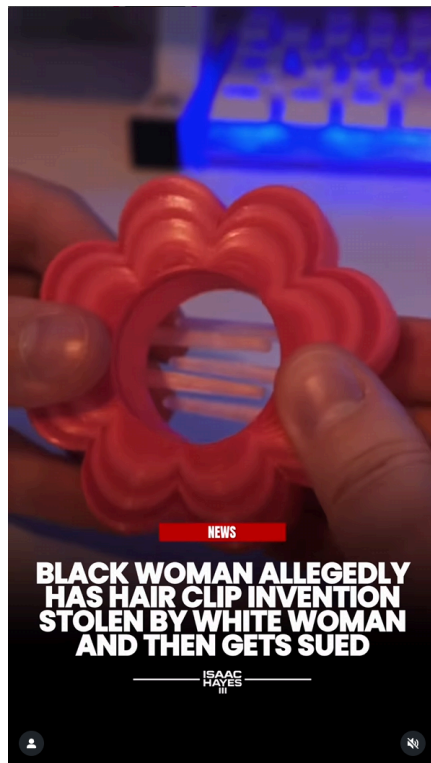
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Exhibit B





isaachayes3 and 4 others
Original audio

Comment FANPOD to watch h the latest episode of Invested.
22h

kiandria Since that story came out on TikTok, she has tried to hold me in contempt of court for things completely outside of my control... like my followers speaking up once they learned someone was suing me. She's even sent emails threatening me with fines or jail time. On top of that, she took screenshots of unrelated posts where I was calling out racism, and twisted them to make it look like I was threatening her.

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But let's be real...who tries to lock up a civil rights activist for speaking out against racism? It's usually not the good guys. 🤔

19h 7,811 likes Reply ...

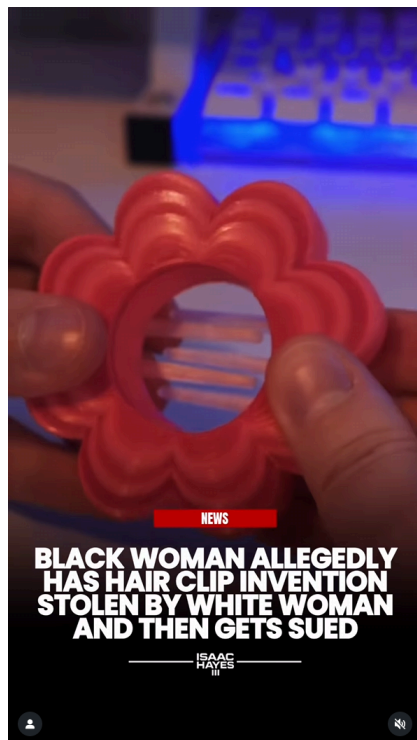
Sep 5, 2025 (163)

kiandria Thank you so much for sharing this story! It is definitely a perfect example of someone using the legal system to try and silence criticism of their unethical behavior. I want to make it clear: I cannot be silenced. I will continue to speak up, I will continue to stand firm, and I will continue to protect Black

♥️ 🔍 🗒️

Liked by kiandria and 72,862 others
22 hours ago

Add a comment... Post



isaachayes3 and 4 others
Original audio

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View replies (163)

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20h 4,833 likes Reply ...

Sep 5, 2025 (36)

loaves.ransum.eth.io Gotta patent the design and the IP

19h 972 likes Reply

View replies (74)

iamchakaparris We have to protect our inventions, before we put them on the market.

20h 926 likes Reply

View replies (19)

imjustdone345 Am i the only one that remembers that sis made those clips to style her LOC?? Not her afro her LOC not her

♥️ 🔍 🗒️

Liked by kiandria and 72,862 others
22 hours ago

Add a comment... Post

Exhibit C

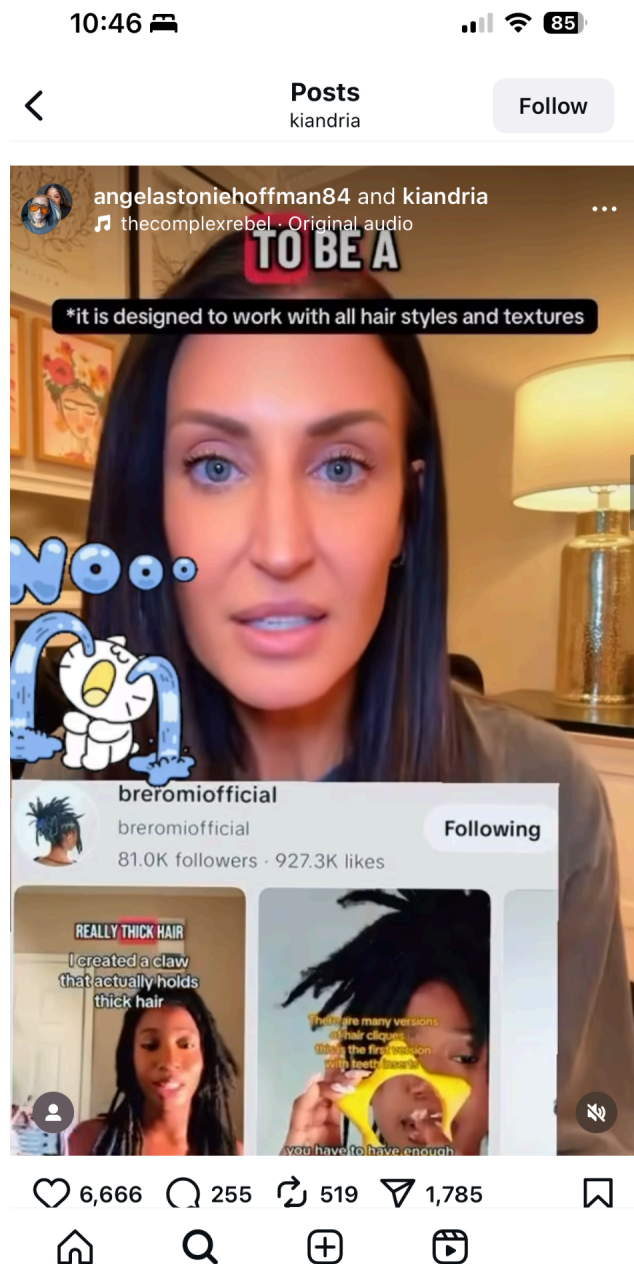
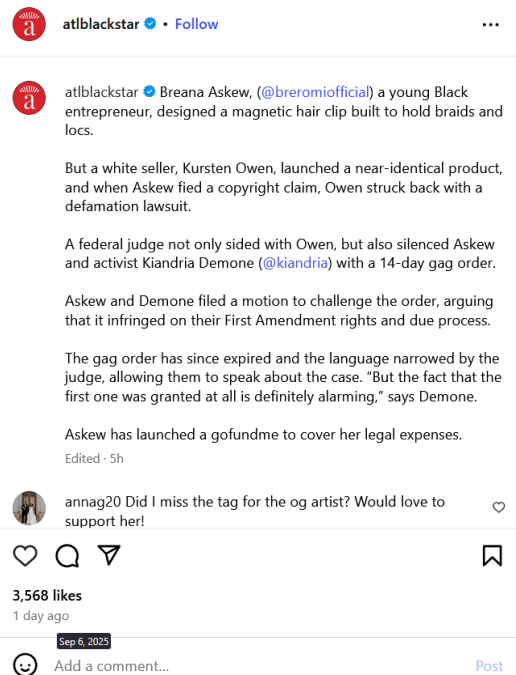
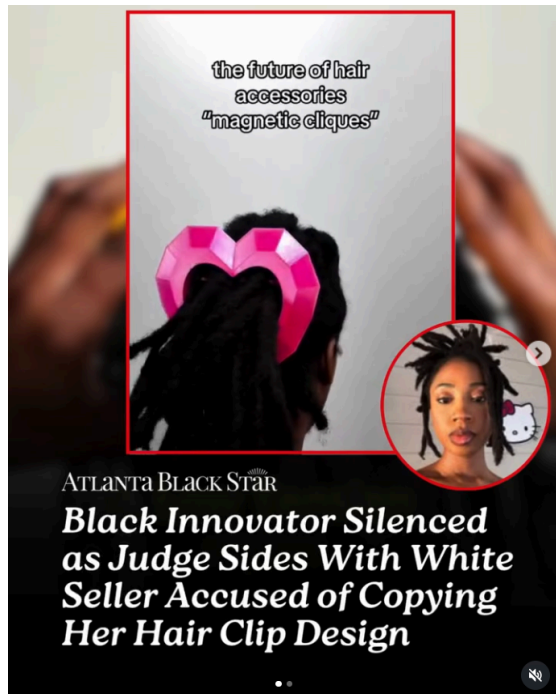



Exhibit D



←

Thread
1.8K views

⋮

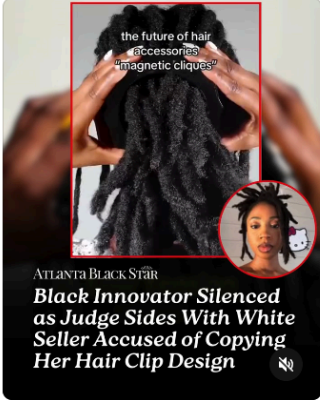
**atblackstar** 6h

Breana Askew, a young Black entrepreneur, designed a magnetic hair clip built to hold braids and locs.

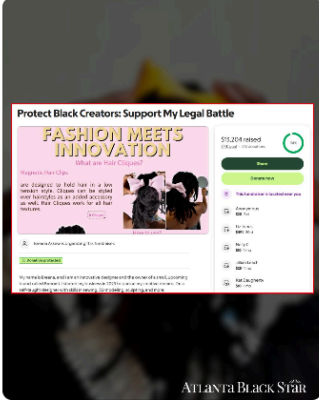
But a white seller, Kursten Owen, launched a near-identical product, and when Askew filed a copyright claim, Owen sued her for defamation.

A federal judge not only sided with Owen but also issued a gag order silencing Askew and activist Keandra, who defended her.

Legal experts warn the order may be unconstitutional, and Askew has launched a gofundme to cover her legal expenses.



ATLANTA BLACK STAR
Black Innovator Silenced as Judge Sides With White Seller Accused of Copying Her Hair Clip Design




ATLANTA BLACK STAR

♡ 827

💬 47

↻ 300

🚩 11

**kiandria** 5h

Saturday, September 6, 2025 at 10:22 AM

My name is Kiandria.

♡ 261

💬

↻ 5


🚩

View activity >

Kiandria's Threads Repost

←

Thread



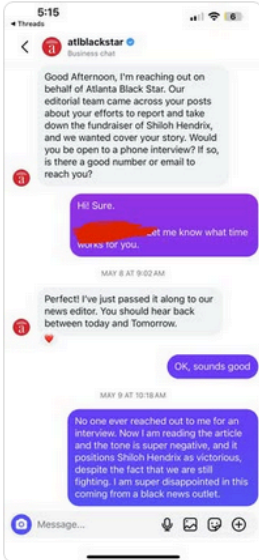
kiandria 2h


Saturday, September 6, 2025 at 2:17 PM

@atlblackstar This has been up all this time and my name is still misspelled. The information is also incorrect. But I'm not surprised, given this was the same media outlet that called Shiloh Hendrix a hero after she raised \$700,000 for calling a Black child the N-word. A white man probably wrote this too. Just like that article. 🙄

6:15

Threads



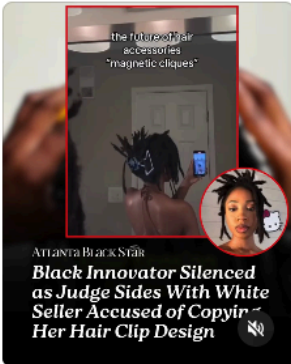


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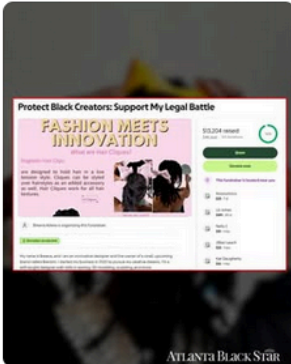
A federal judge not only sided with Owen but also issued a gag order silencing...



the 100 best hair accessories "magnetic cliques"

Atlanta Black Star

Black Innovator Silenced as Judge Sides With White Seller Accused of Copying Her Hair Clip Design



Protect Black Creators: Support My Legal Battle

FASHION MEETS INNOVATION

\$10,000 raised


Atlanta Black Star

♡ 56

💬 2

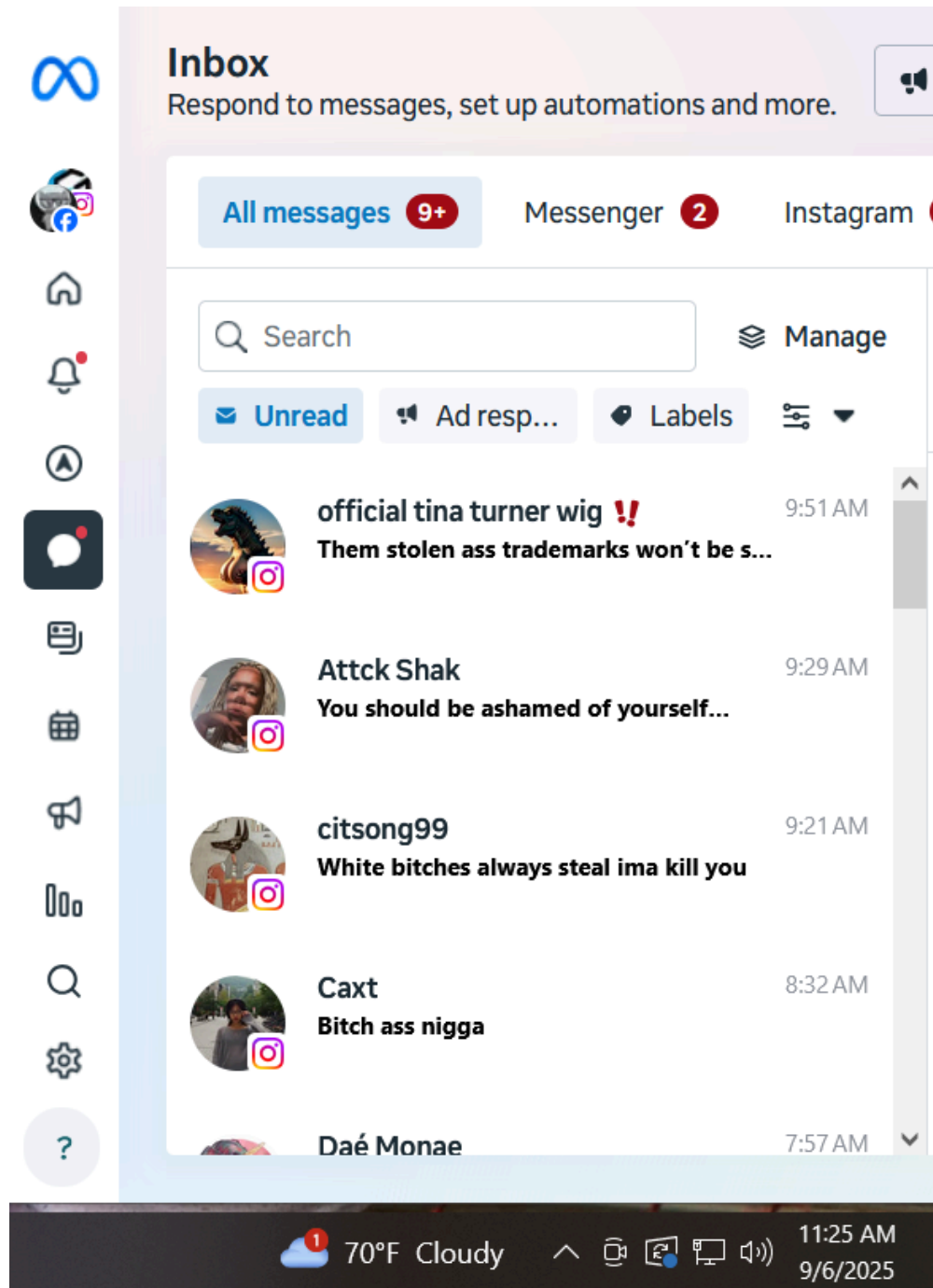
↻ 6

🚩



farrowtami 2h

Exhibit E



**Tae Olson**

Active 7h ago



Sat 10:22 PM

Kursten Owen is a gaping crusty pussied cum dumpster! Just like her whole family of trash! You racist pig that just steals cuz she's too stupid to come up with anything creative herself cuz she like her dad is a failure at life! The whole world wishes you weren't in it. Take a hint! Can't wait for you and your family to get the karma they deserve and I hope you never feel safe again. You pathetic fat ugly piece of trash! We all wish you would jump off a cliff!!!

**Accept message request from Tae Olson (taeson12345)?**

If you accept, they will also be able to call you and see info such as your activity status and when you've read messages.

Block**Delete****Accept**

64°F Mostly cloudy



9:20 AM

9/7/2025



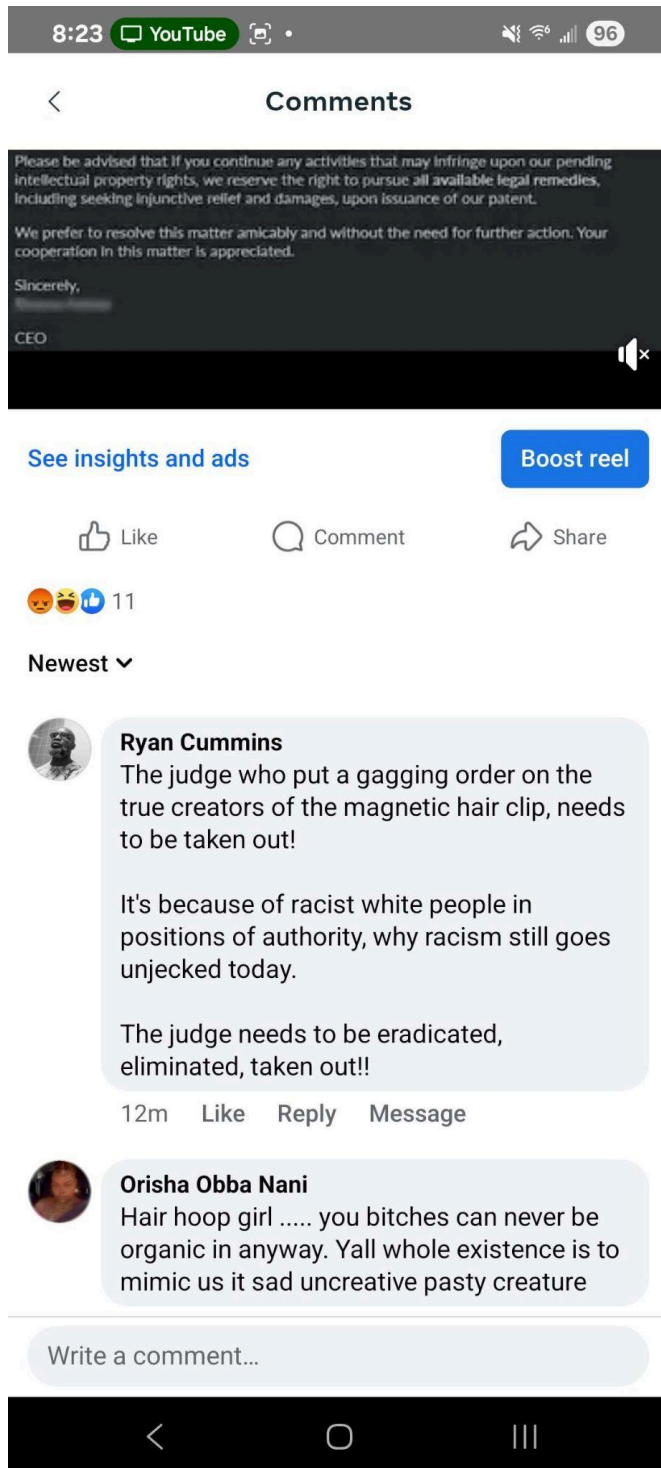


Exhibit F

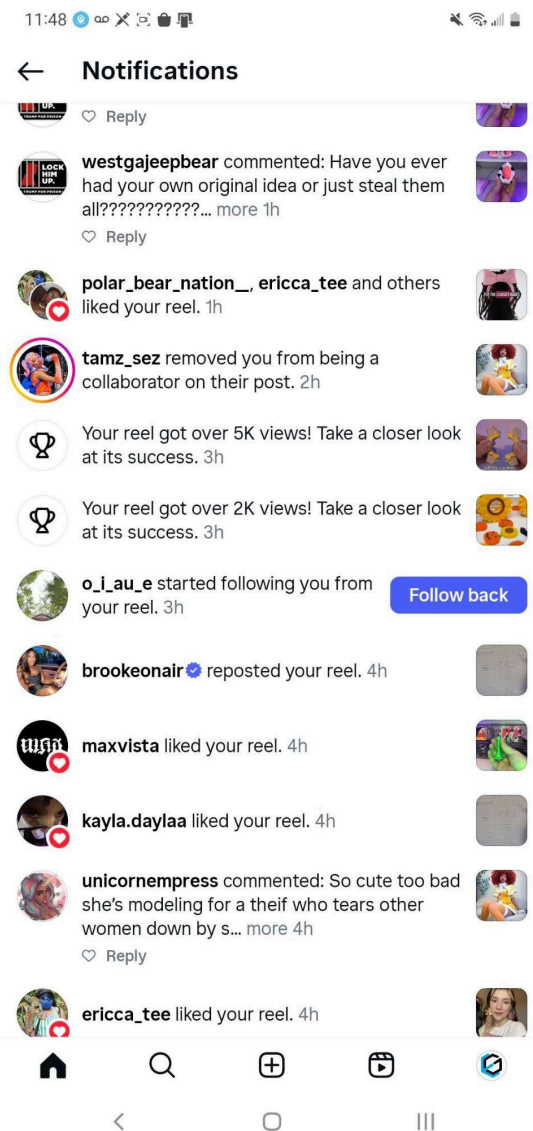
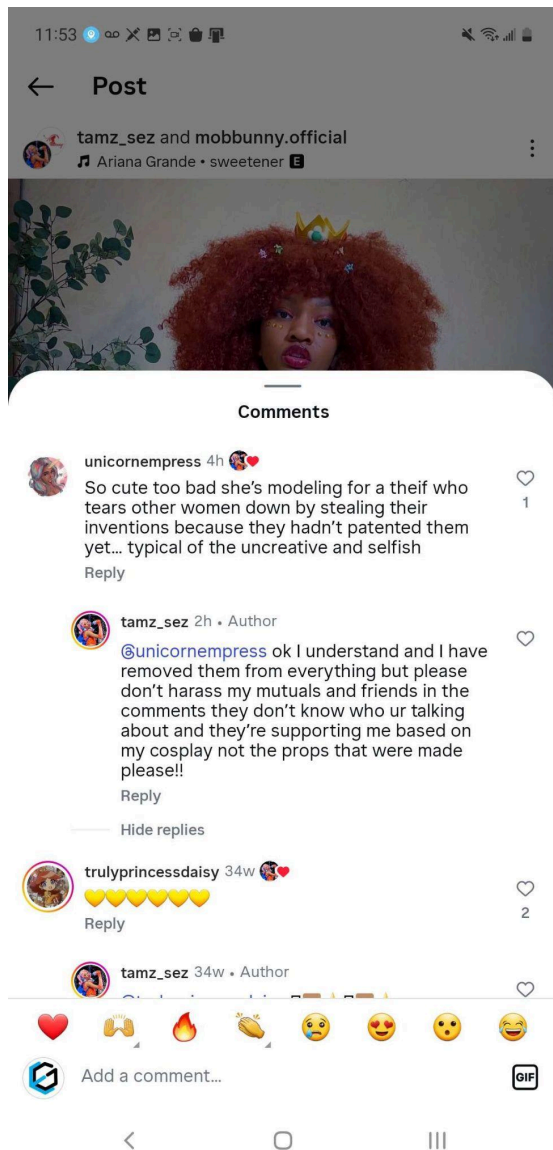


Exhibit G

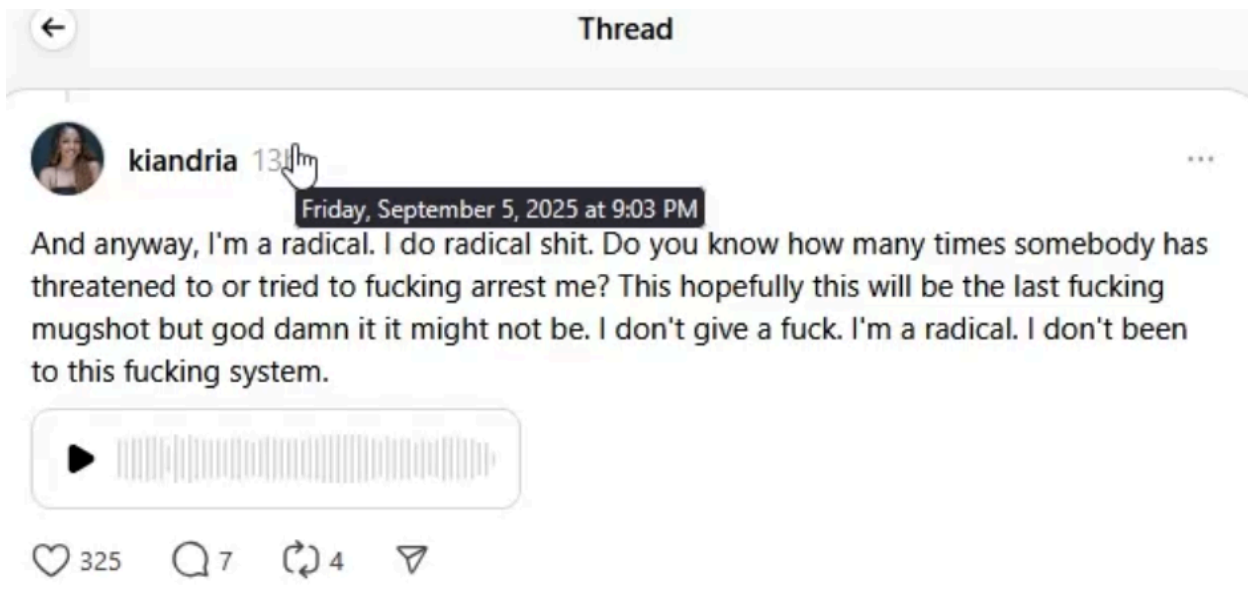


Exhibit H

